The Maritime Radio Historical Society (MRHS) is licensee of public coast station KSM. The station is authorized to use A1A Morse and NBDP on high frequencies in the maritime service. Thus the MRHS has a direct and vital interest in the proposals the FCC will support at WRC-12 regarding the maritime service in the high frequency spectrum. The MRHS hereby respectfully submits its comments regarding these proposals.

In general, the MRHS opposes the adoption of those portions of IWG-1 Agenda Item 1.9 (Parts 1, 3, 4 and 6) and those changes proposed to Appendix 17, Part A that would have a severe negative impact on the operations of KSM and other stations around the world in the maritime service.

Comments

Agenda Item 1.9

IWG-1 Agenda Item 1.9, Parts 1, 3, 4 and 6, call on the FCC to support recommendations at WRC-12 that would have a severe negative impact on the operations of KSM and other coast stations using A1A and NBDP.

Specifically, the agenda item proposes to significantly reduce the number of assignable NBDP frequencies (Part 1), make digital data transmission primary in existing NBDP bands after 1 January 2015 (Part 3), re-designate frequencies assignable to stations using A1A Morse telegraphy to digital data transmission (Part 4) and remove the protection from interference that currently applies to stations using A1A Morse telegraphy (Part 6).

Most egregiously, the provisions of Parts 2 and 3, and 6 if adopted, would permit users of digital data transmission to force stations duly licensed to use A1A and NBDP by the FCC to cease operation by claiming these stations are causing harmful interference.

Taken together, these proposed changes would have a severe negative impact on the current operations of KSM and other stations by removing the protection from interference that currently and traditionally applies to stations in the maritime service, thereby eliminating the possibility of reception of KSM transmissions in many geographic areas.

Further, the provisions in Parts 2, 3 and 6 would permit users of digital data transmission to force users of NBDP and A1A to cease operation without provision to compensate these users for the loss of access to their duly licensed channels or for the cost of shifting to new channels, if indeed any such

new channels would be available if Parts 2, 3 and 6 were adopted.

We recommend that, at minimum, the frequencies currently assigned to KSM for A1A and NBDP, which are in active use, continue to receive the protection from interference as they currently and traditionally enjoy. These frequencies are (in kHz):

A1A	NBDP
4350.5	8433.0
6474.0	12631.0
8438.3	
12993.0	
16914.0	
22445.8	

The MRHS understands the desire to expand the use of digital data transmission in the maritime service. However, because only a few stations currently use A1A Morse and NBDP, the retention of the current and traditional protection against interference for these stations would represent, in the aggregate, only a very small portion of the spectrum that would require protection. The retention of interference protection for these stations would thus have a negligible impact on the expanded use of digital data transmission in the maritime service while at the same time allowing stations using A1A Morse and NBDP to continue their operations.

Specifically, we recommend that, at minimum, the internationally recognized paired NBDP frequencies known as channels 23, 34 and 105, as set forth in §80.361 of the Rules of the FCC, be retained as coast station and ship frequencies and that protection against interference for these frequencies be retained. These frequencies are (in kHz.):

Channel	Coast	Ship
23	6325.0	6274.0
	8427.5	8387.5
	12590.5	12488.0
	16818.0	16694.5
	22387.5	22295.5
34	8433.0	8393.0

12596.0 12493.5
16823.0 16700.0
22393.0 22301.0

105 12631.0 12529.0
16858.5 16740.5

The retention of these few frequencies would represent, in the aggregate, only a very small portion of the spectrum requiring protection. The retention of interference protection for these frequencies would thus have a negligible impact on the expanded use of digital data transmission in the maritime service while at the same time allowing stations using NBDP to continue their operations.

Appendix 17

Certain proposed changes to Part A (Table of subdivided bands 4000 kHz. to 27500 kHz) of Appendix 17 call for the elimination of the current A1A Morse code calling and working frequencies within the referenced bands. Specifically, the proposed changes would make these A1A Morse code calling and working frequencies assignable to ship stations for digital data transmission.

The wholesale elimination of the A1A Morse calling and working frequencies and the imposition of digital data transmission on these frequencies would make it impossible to receive calls from ships due to massive interference and thus would have a severe negative impact on the operation of KSM and other stations using A1A Morse.
The adoption of the recommendation to eliminate the A1A Morse calling and working frequencies would deny stations using this mode useful access to their duly licensed channels without compensation for loss of this access or for the cost of shifting to new channels, if indeed any such new channels would be available if this recommendation were adopted.

The MRHS understands the desire to expand the use digital data transmission. However , because of the small number of ships currently using A1A Morse and the narrow occupied bandwidth of this mode, the retention of only a small number of A1A Morse calling and working frequencies over the entire spectrum would be sufficient to allow the continued operation of KSM and other stations using A1A Morse.

Specifically, we recommend that the internationally recognized worldwide calling frequencies known as ITU channel 3 in each band be retained as A1A Morse calling frequencies and that protection against interference for these frequencies be retained. These frequencies are (in kHz.):

4184.0
6276.0
8368.0
12552.0
16736.0
22280.5

Additionally, we recommend that a subset of the internationally recognized series of working frequencies known as W1 be retained as A1A Morse working frequencies and that protection against interference for these frequencies be retained. These frequencies are (in kHz.):

4187.0
6285.0
8342.0
12422.0
16619.0
22242.0

Given the narrow occupied bandwidth of A1A Morse, the retention of these few calling and working frequencies would represent, in the aggregate, only a very small portion of the spectrum requiring protection. The retention of interference protection for these frequencies would thus have a negligible impact on the expanded use of digital data transmission in the maritime service while at the same time allowing stations using A1A Morse to continue their operations.

While A1A Morse is used less frequently now than it was in the past it is still employed by stations around the world. We regularly monitor coast stations in daily operation in Japan, Korea and China. We receive reports of A1A Morse stations in regular operation in the near east and we read published reports of many more stations still making use of this mode. Thus we suggest that the recommendations that would make the use of A1A Morse virtually impossible would be, if adopted, not only premature but harmful to existing global communications in the maritime service.

Conclusion

The adoption of the recommendations for WRC-12 as they currently stand would have a severe negative impact on the on the operations of KSM and other stations using A1A Morse and NBDP. However with only minor changes to these recommendations, the operation of these stations could

continue with negligible impact on the expansion of digital data transmission in the maritime service.

I respectfully request that the FCC support the changes to the recommendations proposed herein.